

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Liliana Carolina Yanes, individually and on behalf of all )  
others similarly situated, )

Plaintiff(s), )

*-against-* )

Nilkhant 2 Car Wash, LLC d/b/a Bethpage Car Wash, )  
Rakeshbhai Patel, Darpan Patel and Ronak Patel, )

Defendant(s). )

**Case No. 23-cv-09454**

**DECLARATION OF STEVEN J. MOSER IN SUPPORT OF REQUEST TO ISSUE  
CERTIFICATE(S) OF DEFAULT**

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am the attorney for the Plaintiff in this action.
2. I am admitted to practice before this Court.
3. I submit this declaration in support of Plaintiffs' Request for Issuance of Certificate(s)  
of Default.

**Defendant Rakeshbhai Patel**

4. A summons was issued as to Defendant Rakeshbhai Patel on December 28th, 2023. *See* ECF Docket Entry No. 4. The Summons and Complaint was served upon the Defendant Rakeshbhai Patel on January 10<sup>th</sup>, 2024. Proof of service of the Complaint upon Rakeshbhai Patel was filed on January 18<sup>th</sup>, 2024. *See* ECF Docket Entry No. 6.

5. The time for Defendant Rakeshbhai Patel to answer or otherwise move with respect to the complaint herein has expired.

6. The Defendant Rakeshbhai Patel has not answered or otherwise moved with regard to the Complaint.

**Defendant Darpan Patel**

7. A summons was issued as to Defendant Darpan Patel on December 28<sup>th</sup>, 2023. *See* ECF Docket Entry No. 4. The Summons and Complaint was served upon the Defendant Darpan Patel on January 10<sup>th</sup>, 2024. Proof of service of the Complaint upon Darpan Patel was filed on January 18<sup>th</sup>, 2024. *See* ECF Docket Entry No. 7.

8. The time for Defendant Darpan Patel to answer or otherwise move with respect to the complaint herein has expired.

9. The Defendant Darpan Patel has not answered or otherwise moved with regard to the Complaint.

**Defendant Ronak Patel**

10. A summons was issued as to Defendant Ronak Patel on December 28<sup>th</sup>, 2023. *See* ECF Docket Entry No. 4. The Summons and Complaint was served upon the Defendant Ronak Patel on January 10<sup>th</sup>, 2024. Proof of service of the Complaint upon Darpan Patel was filed on January 18<sup>th</sup>, 2024. *See* ECF Docket Entry No. 8.

11. The time for Defendant Ronak Patel to answer or otherwise move with respect to the complaint herein has expired.

12. The Defendant Ronak Patel has not answered or otherwise moved with regard to the Complaint.

**Defendant Nilkhant 2 Car Wash, LLC.**

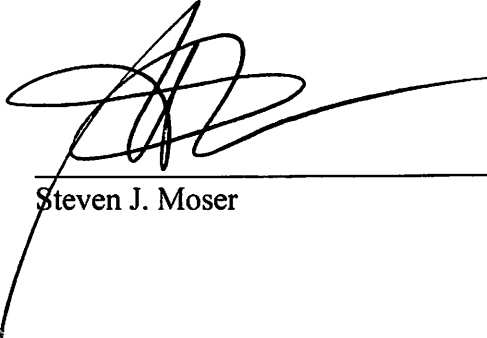
13. A summons was issued as to Defendant Nilkhant 2 Car Wash, LLC. on December 28<sup>th</sup>, 2023. *See* ECF Docket Entry No. 4. The Summons and Complaint was served upon the Defendant Nilkhant 2 Car Wash, LLC. on January 19<sup>th</sup>, 2024. Proof of service of the Complaint upon Nilkhant 2 Car Wash, LLC. was filed on February 5<sup>th</sup>, 2024. *See* ECF Docket Entry No. 12.

14. The time for Defendant Nilkhant 2 Car Wash, LLC. to answer or otherwise move with respect to the complaint herein has expired.

15. The Defendant Nilkhant 2 Car Wash, LLC. has not answered or otherwise moved with regard to the Complaint.

WHEREFORE, Plaintiff requests that the default of Defendant(s) Rakeshbhai Patel, Darpan Patel, Ronak Patel and Nilkhant 2 Car Wash, LLC. be noted and that a Certificate of Default be issued with regard to said Defendants.

Dated: Huntington, New York  
February 23<sup>rd</sup>, 2024



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Steven J. Moser

### **CERTIFICATE OF SERVICE**

I, Shirley Navarro-Losito, hereby certify under the penalties of perjury that (1) I am over 18 years of age and not a party to this action, and (2) on February 23, 2024, I delivered via first class mail, courtesy of the United States Postal Service, a copy of the foregoing Declaration, and the proposed Certificate(s) of Default upon the Defendant(s) at the following address(es).

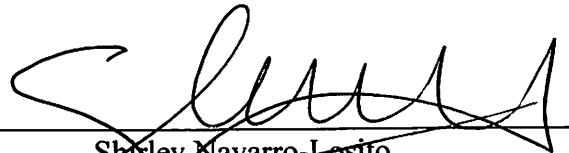
**Nilkhant 2 Car Wash, LLC. d/b/a Bethpage Car Wash  
4110 Hempstead Turnpike  
Bethpage, NY 11714**

**Rakeshbhai Patel  
4110 Hempstead Turnpike  
Bethpage, NY 11714**

**Darpan Patel  
4110 Hempstead Turnpike  
Bethpage, NY 11714**

**Ronak Patel  
4110 Hempstead Turnpike  
Bethpage, NY 11714**

Dated: Huntington, New York  
February 23, 2024

  
Shirley Navarro-Losito

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Liliana Carolina Yanes, individually and on behalf of all  
others similarly situated,

Plaintiff(s),

*-against-*

Nilkhant 2 Car Wash, LLC d/b/a Bethpage Car Wash,  
Rakeshbhai Patel, Darpan Patel and Ronak Patel,

Defendant(s).

**Case No. 23-cv-09454**

**CLERK'S  
CERTIFICATE OF  
DEFAULT AS TO  
DEFENDANT DARPAN  
PATEL**

**C E R T I F I C A T E**

I, DOUGLAS C. PALMER, Clerk of United States District Court for the Eastern District of New York, do hereby certify that the docket entries in the above entitled action indicate that Defendant DARPAN PATEL was served with the Summons and Complaint on January 10<sup>th</sup>, 2024.

I further certify that the docket entries indicate that the Defendant DARPAN PATEL has not filed an answer or otherwise moved with respect to the Complaint herein. The default of the Defendant DARPAN PATEL is hereby noted pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated: \_\_\_\_\_

\_\_\_\_\_  
DOUGLAS C. PALMER  
Clerk of the Court

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Liliana Carolina Yanes, individually and on behalf of all  
others similarly situated,

Plaintiff(s),

*-against-*

Nilkhant 2 Car Wash, LLC d/b/a Bethpage Car Wash,  
Rakeshbhai Patel, Darpan Patel and Ronak Patel,

Defendant(s).

)  
)  
)  
) **Case No. 23-cv-09454**

) **CLERK'S**  
) **CERTIFICATE OF**  
) **DEFAULT AS TO**  
) **DEFENDANT RONA**  
) **K PATEL**

**C E R T I F I C A T E**

I, DOUGLAS C. PALMER, Clerk of United States District Court for the Eastern District of New York, do hereby certify that the docket entries in the above entitled action indicate that Defendant RONA K PATEL was served with the Summons and Complaint on January 10<sup>th</sup>, 2024.

I further certify that the docket entries indicate that the Defendant RONA K PATEL has not filed an answer or otherwise moved with respect to the Complaint herein. The default of the Defendant RONA K PATEL is hereby noted pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated: \_\_\_\_\_

\_\_\_\_\_  
DOUGLAS C. PALMER  
Clerk of the Court

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Liliana Carolina Yanes, individually and on behalf of all	)	
others similarly situated,	)	
	)	
	)	Plaintiff(s),
	)	Case No. 23-cv-09454
	)	
-against-	)	CLERK'S
	)	CERTIFICATE OF
Nilkhant 2 Car Wash, LLC d/b/a Bethpage Car Wash,	)	DEFAULT AS TO
Rakeshbhai Patel, Darpan Patel and Ronak Patel,	)	DEFENDANT
	)	RAKESHBHAI PATEL
	)	
	)	Defendant(s).

**C E R T I F I C A T E**

I, DOUGLAS C. PALMER, Clerk of United States District Court for the Eastern District of New York, do hereby certify that the docket entries in the above entitled action indicate that Defendant RAKESHBHAI PATEL was served with the Summons and Complaint on January 19<sup>TH</sup>, 2024.

I further certify that the docket entries indicate that the Defendant RAKESHBHAI PATEL has not filed an answer or otherwise moved with respect to the Complaint herein. The default of the Defendant RAKESHBHAI PATEL is hereby noted pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated: \_\_\_\_\_

\_\_\_\_\_  
DOUGLAS C. PALMER  
Clerk of the Court

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Liliana Carolina Yanes, individually and on behalf of all  
others similarly situated,

Plaintiff(s),

*-against-*

Nilkhant 2 Car Wash, LLC d/b/a Bethpage Car Wash,  
Rakeshbhai Patel, Darpan Patel and Ronak Patel,

Defendant(s).

Case No. 23-cv-09454

CLERK'S  
CERTIFICATE OF  
DEFAULT AS TO  
DEFENDANT  
NILKHANT 2 CAR  
WASH, LLC.

**C E R T I F I C A T E**

I, DOUGLAS C. PALMER, Clerk of United States District Court for the Eastern District of New York, do hereby certify that the docket entries in the above entitled action indicate that Defendant Nilkhant 2 Car Wash, LLC. was served with the Summons and Complaint on January 19<sup>th</sup>, 2024.

I further certify that the docket entries indicate that the Defendant Nilkhant 2 Car Wash, LLC. has not filed an answer or otherwise moved with respect to the Complaint herein. The default of the Defendant Nilkhant 2 Car Wash, LLC. is hereby noted pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated: \_\_\_\_\_

\_\_\_\_\_  
DOUGLAS C. PALMER  
Clerk of the Court